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Baer, T

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HARTFORD CASUALTY INSURANCE
COMPANY,

Plaintiff,

- against -

CLM GROUP, INC. d/b/a COUNCIL ON
LITIGATION MANAGEMENT, HARRY
ROSENTHAL, ERIC GILKEY and BRYAN
PIFER

Defendants.

Hon. Harold Baer, Jr.

Case No. 12 CIV 1109

[PROPOSED]

**STIPULATION AND ORDER FURTHER
EXTENDING TIME TO FILE
RESPONSIVE PLEADING PENDING
ONGOING SETTLEMENT DISCUSSIONS**

IT IS HEREBY STIPULATED by and between the undersigned attorneys
for Plaintiff and Defendants as follows:

- (1) The time for Defendants to serve an Answer to the Complaint or otherwise move in response to the Complaint is hereby extended to and including April 16, 2012.
- (2) This is the second request for an extension.
- (3) Plaintiff Hartford Casualty Insurance Company filed this action on or about February 14, 2012, stating causes of action for declaratory relief;
- (4) Hartford personally served its complaint on Defendants on or about February 14, 2012, such that its response was due on or about March 6, 2012;
- (5) The parties actively began settlement negotiations and entered into a stipulation, approved by this Court on an Order on February 29, 2012, which provided that in light of the ongoing settlement negotiations, the defendants' date by which to respond were extended through April 1, 2012;

(6) The parties continue to be engaged in fruitful settlement negotiations and are hopeful that a further extension of time in which to respond to the complaint will assist the parties in their efforts to conclude a settlement of this action and avoid unnecessary expense and use of the Court's time.

Therefore, the parties stipulate and agree, subject to approval of the Court by the entry of this Order, that Plaintiff and Defendants shall have up to and including April 16, 2012 to file their responsive pleadings.

Dated: March 26, 2012
New York, New York

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Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED that the defendants CLM GROUP, INC. d/b/a COUNCIL ON LITIGATION MANAGEMENT, HARRY ROSENTHAL, ERIC GILKEY and BRYAN PIFER may have to and including April 16, 2012, within which to respond to the complaint on file herein.

and the PTC scheduled for April 15 is also adjourned until May 3, 2012 at 3 PM unless a notice of disagreement is filed by that date. There will likely be no further adjournments.

Dated: March 30, 2012
New York, New York


Hon. Harold Baer, Jr.
United States District Judge

and the PTC scheduled for April 5 is also adjourned until May 3, 2012 at 3:00 P.M. unless a Stipulation of discontinuance is on my desk by that date. There will likely be no further adjournments.